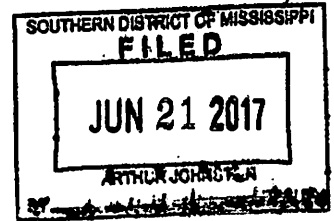


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:17 CR 56 HSO-JCG

NIKITA MARIE PIERNAS,
ANDREA REENE OPOKU,
TYRONE LEONARD THOMAS, JR.,
BEVERLY ANN CLAYTON,
THOMAS LUTHER DAVIS,
JAMES THOMAS DAVIS III,
CAURICIA WILLIAMS,
THOMAS ELLIOTT WILLIAMS,
BRITTANY JALISA PAYNE,
TERRY ONEAL GRANT,
KAYLA TIARA CALDWELL and
MARCUS DESHAWN PRICE

21 U.S.C. § 846
21 U.S.C. § 841
21 U.S.C. § 843(a)(3)

The Grand Jury charges:

COUNT 1

That beginning at least as early as 2014 and continuing up to the date of this Indictment, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **NIKITA MARIE PIERNAS, ANDREA REENE OPOKU, TYRONE LEONARD THOMAS, JR., BEVERLY ANN CLAYTON, THOMAS LUTHER DAVIS, JAMES THOMAS DAVIS III, CAURICIA WILLIAMS, THOMAS ELLIOTT WILLIAMS, BRITTANY JALISA PAYNE, TERRY ONEAL GRANT, KAYLA TIARA CALDWELL and MARCUS DESHAWN PRICE**, did knowingly and intentionally conspire with each other and others both known and unknown to the Grand Jury, to distribute and dispense controlled substances outside the scope of professional practice, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, Hydrocodone, a Schedule II narcotic drug

controlled substance, Amphetamine/Dextroamphetamine, a Schedule II narcotic drug controlled substance, and Alprazolam and Klonopin, both Schedule IV non-narcotic controlled substances, as prohibited by Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

COUNT 2

That on or about December 30, 2014, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: Amphetamine/Dextroamphetamine, a Schedule II narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 3

That on or about December 31, 2014, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **NIKITA MARIE PIERNAS and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: alprazolam, a Schedule IV non-narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 4

That on or about April 2, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and

dispensed a controlled substance outside the scope of professional practice, to wit:

Amphetamine/Dextroamphetamine, a Schedule II narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 5

That on or about June 18, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **NIKITA MARIE PIERNAS and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: alprazolam, a Schedule IV non-narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 6

That on or about July 13, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BEVERLY ANN CLAYTON**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired or obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 7

That on or about August 17, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **TYRONE LEONARD THOMAS, JR. and BEVERLY ANN CLAYTON**, aided and abetted by others known and unknown to the grand jury,

knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 8

That on or about August 17, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BEVERLY ANN CLAYTON**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired or obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 9

That on or about September 1, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BEVERLY ANN CLAYTON**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud prescription in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 10

That on or about October 8, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS LUTHER DAVIS**, aided and abetted

by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 11

That on or about October 9, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **JAMES THOMAS DAVIS III**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 12

That on or about October 9, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **CAURICIA WILLIAMS**, aided and abetted by others known and unknown to the grand jury, acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 13

That on or about October 15, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 14

That on or about October 19, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BRITTANY JALISA PAYNE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 15

That on or about October 22, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS LUTHER DAVIS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by

engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 16

That on or about November 4, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 17

That on or about November 6, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **BRITTANY JALISA PAYNE and THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 18

That on or about November 6, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS LUTHER DAVIS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug

controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 19

That on or about November 10, 2015, in Lamar County, in the Southern Division of the Southern District of Mississippi, the defendants, **TERRY ONEAL GRANT and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 20

That on or about November 10, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 21

That on or about November 10, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **CAURICIA WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained

possession of a controlled substance to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 22

That on or about November 16, 2015, in Lamar County, in the Southern Division of the Southern District of Mississippi, the defendant, **TERRY ONEAL GRANT**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 23

That on or about November 20, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS LUTHER DAVIS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 24

That on or about November 20, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **NIKITA MARIE PIERNAS and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 25

That on or about November 30, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **KAYLA TIARA CALDWELL**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 26

That on or about December 17, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BRITTANY JALISA PAYNE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 27

That on or about December 18, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **JAMES THOMAS DAVIS III**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance outside the scope of professional practice, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 28

That on or about December 18, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS LUTHER DAVIS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 29

That on or about December 18, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance outside the scope of professional practice, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 30

That on or about December 23, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **THOMAS ELLIOTT WILLIAMS**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 31

That on or about December 28, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **MARCUS DESHAWN PRICE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 32

That on or about December 28, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **MARCUS DESHAWN PRICE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by

engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 33

That on or about December 29, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **NIKITA MARIE PIERNAS** and **ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 34

That on or about December 30, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **MARCUS DESHAWN PRICE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 35

That on or about December 30, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **KAYLA TIARA CALDWELL**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by

engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 36

That on or about January 4, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BEVERLY ANN CLAYTON**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 37

That on or about January 4, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **MARCUS DESHAWN PRICE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 38

That on or about January 11, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **MARCUS DESHAWN PRICE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance outside the scope of professional practice, to wit:

Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 39

That on or about January 25, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **BRITTANY JALISA PAYNE**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally acquired and obtained possession of a controlled substance, to wit: Hydrocodone, a Schedule II narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 40

That on or about January 27, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendant, **NIKITA MARIE PIERNAS and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: Klonopin, a Schedule IV non-narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 41

That on about February 8, 2016, in Lamar County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendant, **TERRY ONEAL GRANT**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally attempt to acquire and obtain possession of a controlled substance, to wit: Oxycodone, a Schedule II

narcotic drug controlled substance, by misrepresentation, fraud, forgery, deception or subterfuge, to wit: by engaging in prescription fraud in violation of Sections 843(a)(3), Title 21, United States Code, and Section 2, Title 18, United States Code.

COUNT 42

That on or about February 8, 2016, in Harrison County, in the Southern Division of the Southern District of Mississippi, the defendants, **NIKITA MARIE PIERNAS and ANDREA REENE OPOKU**, aided and abetted by others known and unknown to the grand jury, knowingly and intentionally distributed and dispensed a controlled substance outside the scope of professional practice, to wit: Oxycodone, a Schedule II narcotic drug controlled substance, in violation of Sections 841(a)(1), Title 21, United States Code, and Section 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendants, **NIKITA MARIE PIERNAS, ANDREA REENE OPOKU, TYRONE LEONARD THOMAS, JR., BEVERLY ANN CLAYTON, THOMAS LUTHER DAVIS, JAMES THOMAS DAVIS III, CAURICIA WILLIAMS, THOMAS ELLIOTT WILLIAMS, BRITTANY JALISA PAYNE, TERRY ONEAL GRANT, KAYLA TIARA CALDWELL and MARCUS DESHAWN PRICE**, shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty,

then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury


HAROLD BRITTAIN
Acting United States Attorney

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 21st day of June, 2017.


UNITED STATES MAGISTRATE JUDGE